

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CLERK 
SO. DIST. OF GA.

UNITED STATES OF AMERICA

v.

JOHN PAUL JOSEPH KEEGAN

SHARON ELIZABETH KEEGAN

) INDICTMENT NO.

)

) 18 U.S.C. § 2251(a)

) Production of Child Pornography

)

) 18 U.S.C. § 2251(b)

) Production of Child Pornography by
a Parent or Guardian

)

) 18 U.S.C. § 18 U.S.C. § 2252A(a)(2) and
(b)

) Distribution of Child Pornography

)

) 18 U.S.C. § 2252A(a)(2)

) Receipt of Child Pornography

)

) 18 U.S.C. § 2252A(a)(5)(B)

) Possession of Child Pornography

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THE GRAND JURY CHARGES THAT:

COUNT ONE

Production of Child Pornography by a Parent or Guardian
18 U.S.C. § 2251(b)

On or about December 11, 2019, in Liberty County, within the Southern
District of Georgia, the defendant,

JOHN PAUL JOSEPH KEEGAN,

being the parent of minor victim 1 (MV1), did knowingly employ, use, persuade,
induce, entice or coerce MV1, a minor whose identity is known to the Grand Jury, to
engage in sexually explicit conduct for the purpose of producing a visual depiction of
such conduct, and that visual depiction was produced using materials that had been

mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer to wit: an image or video with file name 1211191613.mp4 depicting MV1 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(b).

COUNT TWO

Production of Child Pornography
18 U.S.C. § 2251(a)

On or about March 14, 2019, in Liberty County, within the Southern District of Georgia, the defendant,

JOHN PAUL JOSEPH KEEGAN,

did knowingly employ, use, persuade, induce, entice or coerce minor victim 2 (MV2), a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer, to wit: an image with file name 2019-3-11 20.40.55 depicting MV2 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT THREE
Production of Child Pornography
18 U.S.C. § 2251(a)

On or about May 9, 2019, in Liberty County, within the Southern District of Georgia, the defendant,

JOHN PAUL JOSEPH KEEGAN,

did knowingly employ, use, persuade, induce, entice or coerce MV2, a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer, to wit: an image with file name 2019-05-09 21.22.35 depicting MV2 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR

Receipt of Child Pornography

18 U.S.C. § 2252A(a)(2)

On or about January 3 and 4, 2020, in Liberty County, within the Southern District of Georgia, the defendant,

JOHN PAUL JOSEPH KEEGAN,

did knowingly receive child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), that is, images visually depicting minors, individuals who had not attained the age of eighteen, engaged in sexually explicit conduct, to wit: an image with a file name 8821.jpg, said images having been transported in interstate or foreign commerce using a means or facility of interstate or foreign commerce. All done in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT FIVE
Possession of Child Pornography
18 U.S.C. § 2252A(a)(5)(B)

Beginning at a time unknown to the Grand Jury but at least on or about January 8, 2020, in Liberty County, within the Southern District of Georgia, the defendant,

JOHN PAUL JOSEPH KEEGAN,

did knowingly possess child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that is, any visual depiction of a minor, any person under 18 years old, engaged in sexually explicit conduct, said images were produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT SIX
Production of Child Pornography
18 U.S.C. § 2251(a)

On or about January 3, 2020, in Liberty County, within the Southern District of Georgia, the defendant,

SHARON ELIZABETH KEEGAN,

did knowingly employ, use, persuade, induce, entice or coerce MV2, a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce by any means, including by computer, to wit: an image with file name of 8814.jpg depicting MV2 engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT SEVEN

Distribution of Child Pornography

18 U.S.C. § 2252A(a)(2) and (b)

On or about January 3 and 4, 2020, in Liberty County, within the Southern District of Georgia, the defendant,

SHARON ELIZABETH KEEGAN,

knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), any visual depiction of sexually explicit conduct, where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct, that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, to wit: an image with file name 8821.jpg.

All in violation of Title 18, United States Code, 2252A(a)(2) and (b).

COUNT EIGHT

Possession of Child Pornography

18 U.S.C. § 2252A(a)(5)(B)

Beginning at a time unknown to the Grand Jury but at least on or about January 8, 2020, in Liberty County, within the Southern District of Georgia, the defendant,

SHARON ELIZABETH KEEGAN,

did knowingly possess child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that is, any visual depiction of a minor, any person under 18 years old, engaged in sexually explicit conduct, said image was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce.

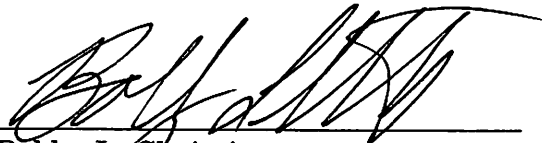
All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

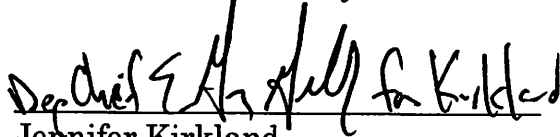
FORFEITURE ALLEGATION


The allegations contained in Counts One through Eight of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.


Upon conviction of Counts One through Eight of this Indictment charging violations of Title 18, United States Code, Sections 2252A(a)(2), 2252A(a)(5)(B), 2251(a) and 2251(b), the defendants, **JOHN PAUL JOSEPH KEEGAN** and **SHARON ELIZABETH KEEGAN**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 2253(a)(1) and (a)(3), any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110 and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable thereto.

A True Bill. *n* *a*


Bobby L. Christine
United States Attorney


Jennifer Kirkland
Assistant United States Attorney
*Co-lead Counsel


Karl I. Knoche
Assistant United States Attorney
Chief, Criminal Division


Tara M. Lyons
Assistant United States Attorney
*Lead Counsel